

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

**WILBERT COOLEY AND
KANDEE COOLEY**

Plaintiffs.

VS.

**AMERIQUEST MORTGAGE
COMPANY, a Delaware Corporation
HERITAGE TITLE, LLC, AND
FICTITIOUS A-Z, inclusive**

Defendants.

**CIVIL ACTION NUMBER
CV-6-215-BH-M**

MOTION FOR EXTENSION OF TIME
IN WHICH TO ANSWER COMPLAINT

COMES NOW, the undersigned counsel for Defendant, Ameriquest Mortgage Company and files this Motion for Extension of Time in Which to Answer Complaint. As grounds for this Motion, the Defendant states as follows:

1. The Answer to the above-styled Complaint is due on Wednesday, May 10, 2006.
2. The undersigned counsel was just retained by Defendant, Ameriquest Mortgage to represent it in the above-styled matter as counsel of record.
3. Counsel has not had an opportunity to meet with the Defendant to confer and investigate the claims set forth in the Complaint, and needs additional time in order to answer the Complaint.
4. Counsel for Defendant contacted Plaintiffs' attorney who has no objection to this request for an extension of time.

5. Therefore, based upon the foregoing reasons, Defendant respectfully requests an extension of fourteen (14) days, in which to answer the Complaint. Based upon this request, the Answer will be due on May 24, 2006.

WHEREFORE, PREMISES CONSIDERED, the undersigned respectfully requests that this Honorable Court issue an Order granting this Motion for Extension of Time in Which to Answer Complaint.

Respectfully submitted,

/s/ Robin Beardsley
Kaye K. Houser (HOU022)
Robin L. Beardsley (BEA066)
Attorneys for Ameriquest Mortgage
Company

OF COUNSEL:

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been served upon all counsel of record, as follows, by ECF notification or regular United States mail, on this the 8th day of May, 2006.

April England-Albright
116 Mabry Street
Selma, Alabama 36701

/s/ Robin Beardsley
OF COUNSEL